

REMARKS

This application has been carefully reviewed in light of the Office Action dated December 16, 2005. Claims 1-5 remain pending in this application. Claim 1 is the independent Claim.

On the merits, the Office Action rejected Claims 1-5 under 35 U.S.C. § 102(b) as being anticipated by Huang (U.S. Patent No. 6,767,753; hereinafter "Huang"). Applicant hereby traverses the rejection for at least the following reasons.

Huang recites in Col. 4, lines 48-64 that the encapsulant 402 is at the same or lower than the level of active surface 132 of semiconductor 130. According to Huang, the active surface 132 must be exposed in the vacuum environment 126 of the package. Huang specifically fails to recite or suggest an encapsulant for completely encapsulating the die, die pad, bond wire and bond pad. Thus Huang fails to recite or suggest every element of Applicant's Claim 1 and Applicant respectfully traverses the Office Action's 102(b) rejection.

Claims 2-5 depend from Claim 1 above and are believed patentable for at least the same reasons. Additionally, Huang fails to recite or suggest the vertical surface of the die pad provided with interlocking means as in Claim 2. Additionally, Huang fails to recite or suggest a vertical surface of the die pad provided with means for interlocking the die pad vertically and laterally as recited in Claim 3. Additionally, Huang fails to

recite or suggest a first and a second vertical surface of at least one pad provided with interlocking means as recited in Claim 4. Additionally, Hunag fails to recite or suggest a vertical surface of a bond pad provided with interlocking means as recited in Claim 5. Thus, Applicant respectfully traverses the § 102(b) rejections of Claims 2-5 and requests their withdrawal.

In view of the foregoing remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application. Applicant's undersigned attorney may be reached by telephone at the number given below.

Respectfully submitted,

By


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